

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

vs.

JASON DANIEL GANDY

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§

CASE NO. 4:12-CR-00503

JOINT MOTION TO WITHDRAW

TO THE HONORABLE LEE H. ROSENTHAL:

Dan Cogdell and Nicole DeBorde hereby move this Court to allow them to withdraw as attorneys for Defendant Jason Gandy, showing for cause as follows:

1. Defendant has hired new counsel and on April 3, 2017 Dustan Neyland filed his notice of appearance.

2. An irreconcilable difference between Attorneys and Defendant has arisen. Attorneys have lost the ability to effectively communicate with the Defendant and no longer have the attorney-client relationship necessary to provide effective assistance of counsel. It is in the best interest of the Defendant for the Attorneys to withdraw and proceed with his newly retained attorney. Defendant is opposed to this motion.

3. Attorneys have spoken with Assistant U.S. Attorney Sherri Zack who is unopposed to this motion.

WHEREFORE, Dan Cogdell and Nicole DeBorde respectfully request that they be allowed to withdraw as attorney for Defendant.

Respectfully submitted,

COGDELL LAW FIRM, P.L.L.C.

/s/ DAN COGDELL

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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant U.S. Attorney Sherri Zack who is unopposed to this motion.

/s/ DAN COGDELL
DAN COGDELL

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2017, I filed a true and correct copy of the foregoing via the electronic case filing system of the Southern District of Texas, which sent a notice of filing to all interested parties.

/s/ DAN COGDELL
DAN COGDELL